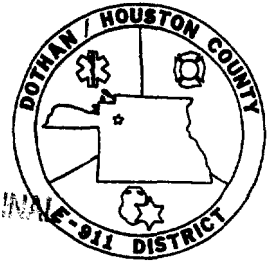


**Dothan/Houston County 9-1-1 District**

Post Office Box 2128  
Dothan, Alabama 36302  
334/793-0356



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March 19, 2001

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ms. Magalie R. Salas  
Secretary  
Federal Communications Commission  
445 12th Street, S.W.  
Washington, DC 20554


**Re: In the Matter of Automatic Roaming Obligations Pertaining to  
Commercial Mobile Radio Services (WT Docket No. 00-193)**

Dear Ms. Salas:

I am the 9-1-1 Coordinator for the Dothan-Houston County Communications District. On behalf of the Communications District, I filed a letter with the Federal Communications Commission in connection with the above-referenced proceeding on February 13, 2001. In that filing, however, we inadvertently provided your office with an incomplete draft of our letter. We also inadvertently attached an e-mail message to the letter. Accordingly, we respectfully request that you retract the entire February 13 filing and substitute the enclosed letter in its place.

Thank you for your attention to this matter. If you have any questions regarding this matter, please do not hesitate to call me.

Sincerely,

  
Captain Jim Smith  
9-1-1 Coordinator

Enclosure

cc: Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau  
Paul Murray, Wireless Telecommunications Bureau

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**Re: In the Matter of Automatic Roaming Obligations Pertaining to  
Commercial Mobile Radio Services (WT Docket No. 00-193)**

Dear Ms. Salas:

The Dothan - Houston County Communications District oversees the implementation and operation of E-911 service in the City of Dothan and Houston County, Alabama. We wanted to take this opportunity to state our view on the above-referenced proceeding, which is pending before the Federal Communications Commission. As you know, E-911 service is necessary to enable persons to make emergency calls on their mobile phones. We support the adoption of an automatic roaming rule because such a rule appears necessary to enable many mobile phone users in our community to utilize our E-911 services.

Over the past several years, we have spent considerable time and effort implementing the E-911 system for the City of Dothan and Houston County, Alabama, and ensuring that we will be able to provide service in accordance with the FCC's goals. However, it has been brought to our attention that iDEN (a digital technology used by SMR carriers) subscribers cannot make even basic 911 calls to our E-911 system if they are outside of their home carrier's coverage area, even though another iDEN carrier may offer coverage in the area in question. This problem is due to a lack of roaming agreements between iDEN carriers, which prevents subscribers from using their phones in our jurisdiction if they are outside their home carrier's service area. Because of the lack of technological compatibility between iDEN phones and any other wireless technology, including analog cellular, iDEN subscribers who today find themselves outside of their home carrier's coverage area are truly left with no means by which to call 911 if they were to need emergency assistance.

Our understanding is that iDEN subscribers' inability to call 911 in all instances would be solved if iDEN carriers entered into automatic roaming agreements. Due to the nature of the technology used by such carriers, they can only enter roaming agreements with carriers using similar technology (not cellular or PCS carriers). For whatever reason, however, they are not doing so. Although the Dothan-Houston County Communications

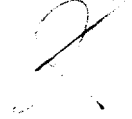
Ms. Magalie R. Salas

Page 2

District is not an advocate for any individual carrier -- we view and treat all carriers equally -- our overriding concern is to facilitate E-911 service to all persons using mobile phones in the City of Dothan and Houston County, Alabama. Therefore, to ensure that all iDEN subscribers have the ability to enhance their safety through the utilization of our system, we believe that adoption of an automatic roaming rule is in the public interest.

Thank you for considering our position on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Jim Smith", with a stylized flourish at the end.

Captain Jim Smith  
9-1-1 Coordinator

cc: Thomas J. Sugrue, Chief, Wireless Telecommunications Bureau  
Paul Murray, Wireless Telecommunications Bureau